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January 15, 2014

VIA ECF & FACSIMILE

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ambrose v. The Mount Sinai Hospital, et al.
11 Civ. 2026 (KAM) (CLP)

Dear Judge Pollak:

On behalf of our clients, The Mount Sinai Hospital and Maxine Shepherd (collectively "Defendants"), I write to request an extension of the Court's deadline for the completion of all depositions in this case from January 31, 2014 to February 21, 2014. The reason for this request is that (i) I am currently involved in a large litigation where the plaintiff noticed approximately fifteen depositions to be completed by January 15, 2014, which has made it difficult for me to schedule and conduct Mr. Ambrose's deposition (*Leena Varughese v. Mount Sinai Medical Center, et al.*, 12 Civ. 8812 (CM) (JCF)); (ii) while Mr. Ambrose's deposition is now scheduled for January 23, 2014, there is a chance that I will not be able to complete his deposition in one full day due to Mr. Ambrose's medical condition and, therefore, I reserved January 27, 2014 as a possible second date to complete his deposition; and (iii) Plaintiff has not conducted the depositions of Maxine Shepherd and Tanya Isaacs, which the Court previously ruled are to be taken after Mr. Ambrose's deposition. Accordingly, a deadline of February 21, 2014 should provide enough time for the parties to conduct all remaining depositions.

In the event that the Court grants Defendants' request, Defendants also request that the Court adjourn the February 7 status conference to a date after February 21. My colleague, Julie Weber, spoke with Plaintiff's counsel Ian Wallace by telephone and Plaintiff consents to both requests.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Rory J. McEvoy', written over a horizontal line.

Rory J. McEvoy

cc: Ian F. Wallace (via facsimile & ECF)
Attorney for Plaintiff